

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and
SCOTT STEDMAN for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for Use in a
Foreign Proceeding.

Case No. _____

**DECLARATION OF ANNE CHAMPION IN SUPPORT OF PETITIONER'S
APPLICATION FOR JUDICIAL ASSISTANCE TO OBTAIN EVIDENCE FOR USE IN
A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

I, Anne Champion, hereby declare under penalty of perjury, pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and am admitted to practice law in the State of New York, the United States District Courts for the Southern, Eastern, and Northern Districts of New York, the Eastern District of Texas, and the United States Courts of Appeals for the Second Circuit, the D.C. Circuit, and the Federal Circuit. My firm represents Forensic News LLC and Scott Stedman (the "Petitioners"). I make this declaration in support of Petitioners' application for Judicial Assistance to Obtain Evidence for use in a Foreign Proceeding Pursuant to 28 U.S.C. § 1782 (the "Application"). I am over the age of eighteen years and am not a party to this action.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a subpoena for deposition for Richard Frankel dated March 31, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a webpage entitled "About Us Forensic News Modern Investigative Journalism" published on the website for Forensic News LLC, available at <https://forensicnews.net/about/>.

4. Attached as **Exhibit 3** is a true and correct copy of a webpage entitled “Scott Stedman About The Author” found on the website for Simon & Schuster, available at <https://www.simonandschuster.com/authors/Scott-Stedman/158412147>.

5. Attached as **Exhibit 4** is a true and correct copy of the First Appendix to the Particulars of Claim filed in the High Court of Justice, Queen’s Bench Division, on August 16, 2020 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

6. Attached as **Exhibit 5** is a true and correct copy of an article by Natasha Bertrand, entitled “Senate Intelligence Committee summons mysterious British security consultant,” published by Politico on June 5, 2019, available at <https://www.politico.com/story/2019/06/05/senate-intelligence-committee-british-security-consultant-1353675>.

7. Attached as **Exhibit 6** is a true and correct copy of an article published by Seth Hettena, entitled “Walter Soriano: The Security Consultant for Russian Oligarchs, the CIA . . . and Diego Maradona?” dated June 7, 2019, available at <https://sethhettena.com/2019/06/07/walter-soriano-the-security-consultant-for-russian-oligarchs-and-diego-maradona/>.

8. Attached as **Exhibit 7** is a true and correct copy of a press release published by the U.S. Department of the Treasury, entitled “Treasury Designates Russian Oligarchs, Officials, and Entities in Response to Worldwide Malign Activity,” dated April 6, 2018, available at <https://home.treasury.gov/news/press-releases/sm0338>.

9. Attached as **Exhibit 8** is a true and correct copy of an article entitled “Meet Putin’s Oligarchs Most Likely to Get Slapped with Sanctions by Biden Over Ukraine,” published by Forbes on February 2, 2022, available at

<https://www.forbes.com/sites/forbeswealthteam/2022/02/02/meet-putins-oligarchs-most-likely-to-get-slapped-with-sanctions/?sh=17f474005298>.

10. Attached as **Exhibit 9** is a true and correct copy of a press release published by the Newark Field Office of the Federal Bureau of Investigation, entitled “Special Agent in Charge Richard Frankel Retires After 20 Years of Service in the FBI,” dated January 28, 2016, available at <https://www.fbi.gov/contact-us/field-offices/newark/news/press-releases/special-agent-in-charge-richard-frankel-retires-after-20-years-of-service-in-the-fbi>.

11. Attached as **Exhibit 10** is a true and correct copy of an article published by the Times of Israel, entitled “Report: US Senate asks to interview Israeli-Brit in connection with Russia probe,” dated June 6, 2019, available at <https://www.timesofisrael.com/report-us-senate-asks-to-interview-israeli-brit-in-connection-with-russia-probe>.

12. Attached as **Exhibit 11** is a true and correct copy of the Particulars of Claim filed in the High Court of Justice, Queen’s Bench Division, on August 16, 2020 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

13. Attached as **Exhibit 12** is a true and correct copy of the Judgment of the High Court of Justice, Queen’s Bench Division, in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450) filed January 15, 2021.

14. Attached as **Exhibit 13** is a true and correct copy of Judgment of the Court of Appeal (Civil Division) in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. CA 2021-000484) filed December 21, 2021.

15. Attached as **Exhibit 14** is a true and correct copy of an article entitled “Landmark GDPR appeal allowed in Soriano v Forensic News LLC & ors,” published by 5RB on December

21, 2021, available at <https://www.5rb.com/news/landmark-gdpr-appeal-allowed-in-soriano-v-forensic-news-llc-ors/>.

16. Attached as **Exhibit 15** is a true and correct copy of an article by Sam Tobin, entitled “Landmark jurisdiction ruling on data protection and libel claims,” published by the Law Society Gazette on December 22, 2021, available at <https://www.lawgazette.co.uk/news/landmark-jurisdiction-ruling-on-data-protection-and-libel-claims/5111012.article>.

17. Attached as **Exhibit 16** is a true and correct copy of a search for “Richard Mark Frankel” run on New York State Unified Court System’s Attorney Online Services Search, available at <https://iapps.courts.state.ny.us/attorneyservices/wicket/page?4>.

18. Attached as **Exhibit 17** is a true and correct copy of excerpts a Comprehensive Report on Richard Frankel provided by TransUnion, with redactions implemented consistent with Federal Rule of Civil Procedure 5.2(a) to protect personally identifying information.

19. Attached as **Exhibit 18** is a true and correct copy of a webpage entitled “RMF Crisis Management Consultants and Richard M. Frankel, Attorney at Law” found on the website for RMF Crisis Management Consultants, available at <https://rmfcmc.com/>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2022
New York, New York.

/s Anne Champion
Anne Champion